

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

PATRICK POULIN,

Defendant.

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CRIMINAL NO. 1:14cr82-3-TSE

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

1. From on or about March 7, 2013, through on or about March 12, 2014, in the Eastern District of Virginia and elsewhere, the defendant, PATRICK POULIN, did knowingly and willfully combine, conspire, confederate, and agree with Joshua Vandyk and Eric St-Cyr, with intent to commit the following offense against the United States: with the intent to conceal and disguise the nature, location, source, ownership, and control, of property believed to be the proceeds of specified unlawful activity, to knowingly conduct a financial transaction affecting interstate and foreign commerce involving property represented by law enforcement officers, who are known to the United States Attorney, to be proceeds of specified unlawful activity, that is, bank fraud, in violation of Title 18, United States Code, Section 1956(a)(3)(B)

2. In furtherance of the conspiracy and in order to effect its objects and purposes, the defendant and his co-conspirators committed the following acts, among others, in the Eastern District of Virginia and elsewhere:

- a. On or about December 17, 2013, undercover agents caused \$200,000, represented to the conspirators to be part of the proceeds of a bank fraud scheme, to be wired from a Bank of America, N.A. account established in Arlington, Virginia, within the Eastern District of Virginia, account number ending in 6189, to an escrow account of POULIN's law firm in Turks and Caicos.
- b. On or about December 18, 2013, POULIN confirmed receipt of the wired funds and established a corporation, "Zero Exposure Inc.," on behalf of the undercover agents in Turks and Caicos.
- c. On or about December 18, 2013, POULIN caused approximately \$200,000 to be wired from Turks and Caicos to the Cayman Islands.
- d. On or about December 31, 2013, Vandyk and St-Cyr confirmed receipt of the wired funds and began to invest and manage the money on behalf of the undercover agents.
- e. On or about January 12, 2014, POULIN caused a package to be sent via international mail from Quebec, Canada, to an address in Arlington, Virginia, within the Eastern District of Virginia. The package contained a form that identified an undercover agent as a beneficial owner of "Zero Exposure Inc.," and authorized transfer of the entirety of the \$2 million that an undercover agent had represented to be the proceeds of the undercover agent's bank fraud scheme to Turks and Caicos and thereafter to an account with Company C in the Cayman Islands. The undercover agents, however, did not provide the conspirators with additional funds to launder.


- f. On or about February 3, 2014, Vandyk and St-Cyr caused approximately \$197,115.68 to be wired from the Cayman Islands to Turks and Caicos.
- g. On or about February 14, 2014, POULIN caused \$197,115.68 to be wired from Turks and Caicos to a Branch Banking and Trust Company ("BB&T") account for an entity based in Chesterfield, Virginia, within the Eastern District of Virginia, account number ending in 9343.

(All in violation of 18 U.S.C. § 371).

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